

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**ALEXANDER MILNE**

Plaintiff,

v.

**PROJECT PRIMUS, INC.,**

**EZZEDEEN M. SOLEIMAN,**

**and**

**RAMI M. SHUBBAK**

Defendants.

Case No. 1:25-cv-01113 (KPF)

**MEMO ENDORSED**

**PLAINTIFF'S CONSENT MOTION TO  
ADJOURN THE PRE-MOTION CONFERENCE**

Plaintiff Alexander Milne ("Milne"), by and through his attorneys, Dickinson Wright, PLLC, hereby respectfully moves to adjourn the pre-motion conference that is currently scheduled for May 2, 2025 at 3:30 p.m. to a new date that is convenient for the Court. The undersigned has consulted with opposing counsel, who consents to this motion on the Defendants' behalf. As grounds for this motion, the undersigned states:

1. The undersigned gave notice to Dickinson Wright on April 29, 2025, that the undersigned is leaving the firm on May 2, 2025.
2. The undersigned starts a new position with a new firm on May 5, 2025.
3. During this transition period, the undersigned will work to determine whether Dickinson Wright will continue to represent Milne or the undersigned will continue with the representation.

4. Given the transition, the undersigned respectfully requests that the Court adjourn the pre-motion conference that is currently scheduled for May 2, 2025 at 3:30 p.m. to a new date that is convenient for the Court.

5. Either Dickinson Wright or the undersigned-through his new firm-will file an updated notice to the Court early next week to notify the Court as to Milne's representation and the dates counsel will be available for the pre-motion conference.

WHEREFORE, Plaintiff Alexander Milne respectfully requests that the pre-motion conference currently scheduled for May 2, 2025 be adjourned to a date to be determined.

Dated: April 30, 2025.

DICKINSON WRIGHT PLLC

By: /s/ Seth Waxman

Seth B. Waxman (NY Bar#: 4324638)

DICKINSON WRIGHT PLLC

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*Attorneys for Plaintiff Alexander Milne*

Application GRANTED. The conference scheduled for May 2, 2025, is adjourned *sine die*. The parties are to provide an update on or before **May 9, 2025**.

The Clerk of Court is directed to terminate the pending motion at docket entry 16.

Dated: May 1, 2025  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE